

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

GRACIE BAKED LLC, WE CARE RG, INC.,  
and MILLERCOBB LLC, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

GIFTROCKET, INC., TREMENDOUS, INC.,  
NICHOLAS BAUM, KAPIL KALE,  
JONATHAN PINES, and BENJAMIN  
KUBIC,

Defendants.

Case No. 22-cv-04019 (RPK) (VMS)

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Local Civil Rule 1.4, and as detailed in the attached declaration, Adam Pollock of Pollock Cohen LLP respectfully moves this Court for an Order to withdraw as counsel of record for Plaintiffs Gracie Baked LLC, WeCare RG, Inc., and Millercoobb LLC in the above captioned action, and to be removed from the CM/ECF notification list in this matter.

No substitution of counsel is necessary, as above-mentioned Plaintiffs will continue to be represented by Janove PLLC, through attorneys of record Raphael Janove and Liana Vitale.

The Plaintiffs have been notified of the undersigned's departure and this motion, and they consent to the withdraw. A copy of this motion will be served upon them.

DATED:       October 23, 2024  
              New York, New York

Respectfully submitted,

/s/ Adam Pollock  
Adam Pollock

**POLLOCK COHEN LLP**

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*Attorney for Plaintiffs Gracie Baked LLC,  
WeCare RC, Inc., and Millercobb LLC*

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Declaration of Adam Pollock  
in Support of  
Motion to Withdraw as Counsel

I, ADAM POLLOCK, declare as follows:

1. I am the managing partner at the law firm of Pollock Cohen, LLP, co-counsel to Plaintiffs with Janove PLLC.
2. I respectfully submit this declaration in support of my motion for an order permitting my withdrawal as counsel to Plaintiffs.
3. No substitution of counsel is necessary, as the above-captioned Plaintiffs will continue to be represented by Janove PLLC, through attorneys of record Raphael Janove and Liana Vitale.
4. The Plaintiffs have been notified of my departure and this motion, and they consent to the withdraw.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 23, 2024 in New York, New York.

/s/ Adam Pollock  
ADAM POLLOCK